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C&C JEWELRY MANUFACTURING, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION

C&C JEWELRY MFG., INC.,

Case No. 5:09-cv-01303-JF

Plaintiff,

v.

TRENT WEST,

Defendant.

And Related Counterclaims

**JOINT STIPULATION FOR ENTRY OF
SUBSEQUENT CASE MANAGEMENT
SCHEDULE SETTING CASE SCHEDULE
THROUGH TRIAL**

At the parties' subsequent case management conference under Civil L.R. 16-10(c), conducted before the Court on July 30, 2010 (see the Court's Minute Order at Docket Entry No. 96), the Court set the date for the pre-trial conference in this matter for April 1, 2011 and scheduled trial to begin on April 8, 2011. The Court left it to the parties to agree to and propose, for the Court's approval, dates for the other case milestones leading up to trial. Accordingly, Defendant Trent West ("West") and Plaintiff C&C Jewelry Mfg., Inc. ("C&C"), by and through their undersigned counsel of record, have agreed and hereby submit this joint stipulated request, pursuant to Civil L.R. 16-10(d), Civil L.R. 6 and the Court's Minute Order of July 30, 2010, for entry of the following case management schedule for conducting the litigation of this matter through trial:

Event	Proposed Dates
Advice of Counsel - Willfulness Opinion Disclosure under Patent L.R. 3-7 (50 days after service by the Court of its Claim Construction Ruling – but extended per C&C's request)	September 24, 2010
Expert disclosure and serve reports by party with the burden of proof on an issue	December 17, 2010
Fact discovery cut off (serve discovery requests and notice fact witness depositions to be completed by this date)	December 17, 2010
Expert disclosure and serve rebuttal reports by party without the burden of proof on an issue	January 17, 2011
Last day to file dispositive motions	February 7, 2011
Expert discovery cut off – complete expert witness depositions by this date	February 9, 2011
Last day to file Daubert motions objecting to experts	February 18, 2011
Last day to hear dispositive motions	March 14, 2011
Meeting of Counsel for Pre-trial Conference Statement preparation	March 15, 2011
File Joint Pre-trial Conference Statement	March 23, 2011
Pre-trial Conference	April 1, 2011
Trial	April 8, 2011

1 The parties completed Court-sponsored mediation in July.

2 Pursuant to stipulation and the Court's instructions, West and C&C respectfully request
3 the Court to enter the above stipulated case management schedule dates for conducting this
4 matter through trial.

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6 Respectfully stipulated to by:

7 KING & KELLEHER, LLP

STORM LLP

8 By: /s/ Edward Vincent King, Jr.
9 Edward Vincent King, Jr.

By: /s/ Paul V. Storm
Paul V. Storm

10 Attorneys for Defendant Trent West

Attorneys for Plaintiff C&C Jewelry Mfg., Inc.

11 Date: October 13, 2010

Date: October 13, 2010

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14 **PURSUANT TO STIPULATION**, it is hereby ordered that the above stipulated case
15 management schedule shall be entered in this matter.

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17 DATED: November 23, 2010

/s/

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19 Hon. Jeremy Fogel
United States District Judge

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